



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-0435

DAVID W. SALYERS, P.E.
COMMISSIONER

BILL LEE
GOVERNOR

July 10, 2019

Via Electronic Mail to David.A.Adams@usace.army.mil

Attn: David Adams, Biologist
Department of the Army
Nashville District, Corps of Engineers
110 9th Avenue South, Room A-405
Nashville, Tennessee 37203

Dear Mr. Adams:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the U.S. Army Corps of Engineers (USACE) – Nashville District, *Dale Hollow Lake Draft Master Plan Update and associated Environmental Assessment (Draft EA) and unsigned Finding of No Significant Impact (FONSI)*, which is located in Clay, Pickett, Overton and Fentress Counties, in Tennessee. The original Dale Hollow Lake Master Plan was approved in 1946 and last updated in 1976. USACE Master Plans serve as a guide for coordination of project development and management of all land and water resources. The intent of the Draft EA and updated Master Plan is to reflect a current inventory and assessment of resources, provide an analysis of resource use, and evaluate existing and future needs required to protect and improve the value of resources at Dale Hollow Lake.

Actions considered in detail within the Draft EA with Unsigned FONSI include:

- **No Action Alternative.** The No Action alternative is defined as USACE taking no action and therefore not implementing a revision to the Dale Hollow Lake Master Plan. Under this alternative, no new resource analysis and allocation would occur, nor would a revision to project sites' inventory be completed. Requirements regarding periodic revision of Master Plans as outlined by USACE engineering policy would not be incorporated. Operation and management of Dale Hollow Lake would continue as outlined in the 1976 Master Plan Revision. The pre-1996 guidance for land and water classification would remain.
- **Implementation of the Proposed Master Plan Update.** With implementation of the proposed Master Plan Revision, three actions would be incorporated: 1) project land and water allocations and classifications would be made current, 2) an analysis of resource and project use would be conducted, and 3) an evaluation of existing and future needs and demands on the project would be completed. Classifications for project lands and water would be revised to reflect current and anticipated use. Additional descriptions of these classifications and project areas are provided in the Dale Hollow Lake Master Plan Revision, Chapters 4 and 5 and in Section 4.4.1.4 of the draft document.

Implementation of the proposed Master Plan Revision is the preferred alternative. A revision to the Master Plan would allow the most recent and comprehensive information to be incorporated into a document that best reflects environmental stewardship and conservation of Dale Hollow project lands and waters while meeting public, social, and economic demands. The Master Plan Revision specifically addresses recreation, cultural resources, and fish and wildlife (natural resources) management authorizations. This includes operation and management of recreational facilities as well as outgrants to other public agencies and concessionaires to provide additional features. Natural resource management includes management of lands and surface waters and coordination with public agencies and non-profit organizations to protect, enhance, and conserve the environmental resources of the project. Flood control, hydropower, and water supply are beyond the scope of this review and are managed by the Nashville District Office in conjunction with other projects on the Cumberland River.

TDEC has reviewed the Draft EA with Unsigned FONSI and provides the following comments:

Cultural and Natural Resources

TDEC believes the Draft EA adequately addresses potential impacts to cultural and natural resources within the proposed project area and supports the plan.¹

Air Resources

TDEC believes the Draft EA adequately addresses potential impacts to Tennessee air resources.

Water Resources

The City of Byrdstown's public drinking water system intake is on Dale Hollow Lake. Additionally, Celina and Northwest Clay Utility District public drinking water system intakes are located on the Obey River below the dam. Communication with Byrdstown, Celina and Northwest Clay Utility District could be critical should any contamination event or other disaster occur that could affect these intakes. While water supply considerations are outside the scope of the Dale Hollow Lake Master Plan, TDEC encourages USACE Nashville District to establish emergency communication protocols for public drinking water systems, if not already in place.

TDEC requests that mechanical treatment be used for invasive aquatic plants in the vicinity of water supply intakes rather than management through application of aquatic chemicals. If chemical treatment is utilized to manage invasive aquatic plants near the Byrdstown public drinking water system intake, Byrdstown should be informed of the herbicide application that could impact the intake. TDEC encourages USACE to include these considerations in the Final EA.

TDEC encourages USACE to include public water supply intake protection in shoreline development policies and consideration of the location of public water supply intakes when siting new marinas. TDEC encourages USACE to include these considerations in the Final EA.

¹ This is a state-level review only and cannot be substituted for a federal agency Section 106 review/response. Additionally, a court order from Chancery Court must be obtained prior to the removal of any human graves. If human remains are encountered or accidentally uncovered by earthmoving activities, all activity within the immediate area must cease. The county coroner or medical examiner, a local law enforcement agency, and the state archaeologist's office should be notified at once (Tennessee Code Annotated 11-6-107d). If you have questions, please contact Daniel Brock, State Programs Archaeologist at 615-687-4778 or Daniel.Brock@tn.gov.

Based on topography and configuration of Dale Hollow Lake, floating cabins are probably not as likely on this reservoir as others in the state. However, TDEC still encourages USACE to include discussion relating to the status and management of floating cabins on Dale Hollow Lake in the Final EA.

Solid Waste

TDEC recommends that the Final EA reflect that projects resulting in waste generation (e.g. intentionally or accidentally through construction, future operations, or maintenance as informed by the Dale Hollow Lake Master Plan) be evaluated and managed in accordance with the Solid and Hazardous Wastes Rules and Regulations of the State of Tennessee.²

TDEC appreciates the opportunity to comment on this Draft EA with Unsigned FONSI and is supportive of updating the inventory of land uses and classifications and considering those versus expected needs. Please note that these comments are not indicative of approval or disapproval of the proposed action or its alternatives, nor should they be interpreted as an indication regarding future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.

Sincerely,



Kendra Abkowitz, PhD
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Tennessee Department of Environment and Conservation
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(615) 532-8689

cc: Lacey Hardin, TDEC, APC
Lisa Hughey, TDEC, SWM
Tom Moss, TDEC, DWR
Daniel Brock, TDEC, DOA
Stephanie Williams, TDEC, DNA

² Reference TDEC SWM Rule 0400 Chapter 11 for Solid Waste and Chapter 12 for Hazardous Waste
<http://sos.tn.gov/effective-rules>.